



U.S. Department of Justice

Antitrust Division

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December 3, 2014

BY FEDERAL EXPRESS & ECF FILING

Honorable Michael A. Hammer
Martin Luther King, Jr. Federal Building
& United States Courthouse
50 Market Street
Newark, NJ

Re: *United States v. Wolfson, et al.*, 2:13-cr-748-FSH

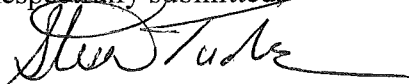
Dear Magistrate Judge Hammer,

Pursuant to Your Honor's instructions, please find enclosed a joint proposed order that has been agreed to by all of the parties. The proposed order embodies the Court's rulings made during the November 3, 2014 hearing and contains the dates on which the parties have reached agreement regarding the production of various trial related items. More specifically, the proposed order provides deadlines for the Government to (1) provide notice of Rule 404(b) evidence, (2) produce work product "review sets" and (3) seek the Court's permission to add up to five additional auctions to its current list of thirty featured auctions. The proposed order also provides deadlines for all parties to produce pre-marked trial exhibits and to challenge exhibit authenticity.

The proposed order does not however, contain a proposed trial date. With the exception of Defendant Gehring, each defendant requests that trial commence in September 2015. Defendant Gehring requests that trial be scheduled for April, May, June or early July 2015 and does not consent to any exclusion of time under the Speedy Trial Act.

The Government will be ready for trial on the earliest date that is convenient for the Court, but respectfully requests that the Court soon set a trial date in order to provide further clarity to the agreed upon deadlines and allow the parties the ability to plan around the scheduled date.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Steven Tugander", written over a horizontal line.

STEVEN TUGANDER

Trial Attorney

Antitrust Division

Attachment

Copy to all counsel with attachment (by email and ECF filing)